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6 Attorneys for Defendant
JOSE FERNANDO GOMEZ-MOREIRA
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 JOSE FERNANDO GOMEZ-
MOREIRA,

15 Defendant.
16

Case No. 1:20-cr-00151-NONE-SKO

**STIPULATION TO CONTINUE STATUS
CONFERENCE**

Date: March 17, 2021

Time: 1:00 p.m.

Judge: Hon. Sheila K. Oberto

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18 The parties, through their respective counsel, Laura Withers, Assistant United States
19 Attorney, counsel for the government, and Benjamin A. Gerson, Assistant Federal Defender,
20 counsel for the defendant, Jose Fernando Gomez-Moreira, hereby stipulate and jointly move this
21 Court to continue Mr. Gomez-Moreira's status conference from February 17, 2021 to March 17,
22 2021.

23 The defense is still awaiting receipt of records necessary to Mr. Gomez-Moreira's case
24 from the Executive Office of Immigration Review. On December 17, 2020, defense counsel
25 received assurances that the requested records would be expedited. Despite these assurances the
26 records have yet to arrive. Defense investigators have renewed their efforts to secure records as
27 quickly as possible.

28 The parties request this continuance with the intention of conserving time and resources

for both the parties and the Court. The parties agree that the delay resulting from the continuance shall be excluded in the interests of justice, including but not limited to, the need for the period of time set forth herein for effective defense preparation, defense investigation, and plea negotiation purposes pursuant to 18 U.S.C. § 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv).

Respectfully submitted,

McGREGOR SCOTT
United States Attorney

Dated: February 10, 2021

/s/ Laura Withers
LAURA WITHERS
Assistant U.S. Attorney

Dated: February 10, 2021

HEATHER E. WILLIAMS
Federal Defender

/s/ Benjamin A. Gerson
BENJAMIN A. GERSON
Assistant Federal Defender
Attorney for Defendant
JOSE FERNANDO GOMEZ-MOREIRA

ORDER

GOOD CAUSE APPEARING, the above stipulation to continue case 1:20-cr-00151 to March 17, 2021, is hereby accepted and adopted as the order of this Court.

IT IS SO ORDERED.

Dated: **February 11, 2021**

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE